




4200 Teal Road  
P.O. Box 68  
Petersburg, MI 49270

734-279-1339  
Fax #: 734-279-2640

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Memo to: Ken Klingsporn  
From: Dave LaRocca   
Teresa Holeman  
Date: February 22, 2000  
Re: Truth in Billing

On February 1<sup>st</sup> we sent you a letter regarding Truth in Billing matters and asked NIBI for a response by February 11<sup>th</sup> to our letter.

It is now February 22<sup>nd</sup>. Although we presumably are trying to set up a conference call to settle the questions in the letter, this has not happened. Therefore, we would like a response in writing, no later than Thursday, February 24, 2000. We need to review this with our attorney so we can assess what actions, if any, we may now need to take regarding our TIB compliance, including whether we will need to seek a further waiver from the FCC.

Thanks



A Subsidiary of Hickory Tech Corporation

215 East Hickory Street P.O. Box 772 Mankato, MN 56002-0772

March 8, 2000

Ph: 507.625.1691

Fax: 507.625.1057

[www.nibinc.com](http://www.nibinc.com)

Mr. David LaRocca  
Deerfield Farmers Tel. Co.  
4200 Teal Rd.  
P.O. Box 68  
Petersburg, MI 49270

Dear David:

The FCC adopted the Truth in Billing Order that will be applicable to all telecommunications wireline carriers. FCC has mandated Truth in Billing to be implemented on April 1, 2000 by all NIBI customers. NIBI acknowledges Truth in Billing and is taking action to help its NIBI customers move toward compliance with the Truth in Billing Regulations. In order to help all NIBI customers move toward becoming compliant, NIBI will provide the option to add enhancements to all current systems.

An assessment, NECA Time and Cost Estimate form, and Illuminet surveys are being provided to all NIBI customers. The assessment provides information on the enhancements to NIBI systems as part of the Truth in Billing requirements. The NECA Time and Cost Estimate and Illuminet surveys will provide the information that NIBI customers may be required to submit. The amount provided for NECA's Time and Cost Estimate reflects only the amount it will take NIBI to enhance systems as part of Truth in Billing requirements. If needed, your additional costs may be added to NECA's Time and Cost Estimate.

Currently, NIBI is updating the Telco Billing and Rating systems to be able to process the 020-A module (used for notification on any Service Provider change). NIBI has set the implementation date for 020-A module use to June 1, 2000.

If any NIBI customers will not be compliant as of April 1, 2000 as mandated by the FCC, a bill insert will need to be provided in all customer bills stating the Truth in Billing Regulations, that the bills are not yet compliant and the reason(s) for not being compliant. For EasyTel and EasyTel2000, a 34-line user-defined statement message is available for creating the billing insert. If the statement message is used and it creates an additional page, the NIBI charge for printing the additional page is \$0.05. If any NIBI customer wishes to use a pre-printed billing insert for customer notification, the cost will be \$0.05 per insert plus the cost of producing the billing insert.

NIBI is not guaranteeing compliance with Truth in Billing Regulations, but is striving to help its customers move towards becoming compliant. If any NIBI customer needs to submit a waiver to the FCC for the April 1, 2000 requirements, it will be their responsibility to contact the FCC for waiver submission information.

As a way of helping NIBI customers understand Truth in Billing, NIBI will be setting up conference calls to help answer any questions. We will be sending you a notification of the conference time by next week.

If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

Sincerely,

NATIONAL INDEPENDENT BILLING, INC.

  
Vicki Sutherland

Business Support Supervisor



**NATIONAL INDEPENDENT  
BILLING INCORPORATED**

A Subsidiary of Hickory Tech Corporation

**PROJECT ASSESSMENT**

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**TO:** David LaRocca, Deerfield Farmers Tel. Co.  
**FROM:** National Independent Billing, Incorporated (NIBI)  
**SUBJECT:** Truth in Billing Requirements  
**DATE:** March 8, 2000  
**OVERVIEW:** Adriana Maldonado, NIBI Business Analyst  
**HOURS/DOLLARS:** Marlys Mackey, Project Administrator

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**OVERVIEW:**

Changes will need to be made to the NIBI EasyTel, Toll Rating and Billing systems as a result of the Truth in Billing Regulations, currently being implemented on April 1, 2000. NIBI is not guaranteeing compliance with Truth in Billing Regulations through this document. This assessment will focus on the requirements of Truth in Billing, system changes needed to meet the requirements, and the options that are available for these requirements as methods that may be used to move toward compliance of the Truth in Billing Regulations.

Following are the five main requirements identified by NIBI:

1. Clear identification of the name of the Service Provider associated with each charge on the customer's bill.
2. A brief, clear, plain language description of the services included on the customer's bill.
3. Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
4. Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement) including, where appropriate, any new presubscribed or continuing relationship with the customer.
5. A differentiation between deniable and non-deniable charges.

The Project Assessment and scheduled release date are based upon the following statements:

**SYSTEM CHANGES:**

System changes will be needed for EasyTel, Toll Rating and Toll Billing systems.

### *Easytel*

#### Requirement #1 – Identify Service Provider with each charge

- Identifying the Service Provider with each charge can be handled through setup. No coding changes will be needed.

#### Requirement # 2 – Clear description of services

- Clear description of service can be handled through setup. No coding changes will be needed.

#### Requirement # 3 – Display toll-free number

- Identifying the toll-free number with each charge can be handled through setup. No coding changes will be needed.

#### Requirement # 4 – Notification of Service Provider Change

- Existing functionality may be used to notify the new service provider. No coding changes will be needed for to notify a service provider change.

#### Requirement # 5 – Differentiation between deniable and non-deniable charges

- Identifying the deniable and non-deniable charges can be handled through setup. No coding changes will be needed.

### *Telco Rating*

#### Requirement #1 – Identify Service Provider with each charge

- System changes will be needed to provide the ability to process 002-B module for identifying Service Provider information on CDR's.

#### Requirement # 2 – Clear description of services

- This requirement is not applicable for telco rating.

#### Requirement # 3 – Display toll-free number

- This requirement is not applicable for telco rating.

#### Requirement # 4 – Notification of Service Provider Change

- System changes will be needed to process the 020-A module and pass the new service provider indicator to telco billing.

#### Requirement # 5 – Differentiation between deniable and non-deniable charges

- This requirement is not applicable for telco rating.

### *Telco Billing*

#### Requirement #1 – Identify Service Provider with each charge

- System changes will be needed to process 9 digit cic (4 = cic, 5 = subcic) values. System changes will be needed to interrogate the subcic information to be presented on the bill.

#### Requirement # 2 – Clear description of services

- This requirement is not applicable for telco billing.

#### Requirement # 3 – Display toll-free number

- Displaying the toll-free number can be handled through setup. No coding changes will be needed.

**Requirement # 4 – Notification of Service Provider Change**

- System changes will be needed to process and check the new service provider indicator and present who the new provider is and place the message on the toll detail page.

**Requirement # 5 – Differentiation between deniable and non-deniable charges**

- Currently, telco billing displays a message pertaining to deniable charges for customers that have 900 messages.

**RECOMMENDATIONS:**

Currently, there are options available in the system to move toward the Truth in Billing requirements. No code changes are necessary for these options, only set up changes.

*Requirement #1 – Identify Service Provider with each charge*

- The Vendor Code description can be used to identify the service provider on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

*Requirement # 2 – Clear description of services*

- Item charge codes may also be used to identify the description of services.
- Itemization can be set up on an individual basis or for all residential or business customers within a cycle.

*Requirement # 3 – Display toll-free number*

- Statement messages may be used to identify a toll-free number.
- For telco billing, the phone number that is printed on each toll detail statement can be used as the toll-free number.

*Requirement # 4 – Notification of Service Provider Change*

- Code change will be needed to notify a service provider change.

*Requirement # 5 – Differentiation between deniable and non-deniable charges*

- Statement messages may be used to identify the deniable and non-deniable charges. Currently, there is a 34-line customer message available in addition to the two-line statement message.
- In conjunction with the statement messages, an "\*" can be placed in front of the description for either deniable or non-deniable charges. A brief description can be placed in the statement messages explaining the charges with an "\*" indicator.
- The Vendor Code description can be used to identify the deniable and non-deniable charges on the local service bill. If the Vendor Code description is used, the Vendor Code switch will need to be set to 'Y' for "Itemize" and respond with 'Y' to "Itemize All Subscribers" when creating laser statements to get a fully itemized bill.

**NOTE:** If you have any questions regarding this information, please contact NIBI Customer Support at (507) 388-0250.

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The Project Assessment reflects an hour/dollar range for completion of the project

|                            |                             |    |                             |
|----------------------------|-----------------------------|----|-----------------------------|
| Requirement # 1            | <u>                    </u> | to | <u>                    </u> |
| Requirement # 2            | <u>                    </u> | to | <u>                    </u> |
| Requirement # 3            | <u>                    </u> | to | <u>                    </u> |
| Requirement # 4            | <u>                    </u> | to | <u>                    </u> |
| Requirement # 5            | <u>                    </u> | to | <u>                    </u> |
| Total Dollar Range will be | <u>                    </u> | to | <u>                    </u> |

This assessment is valid for 45 days from signature date. In the event that the design phase indicates the project cannot be completed in the estimated time, a new Project Assessment will be prepared. The customer then has an option to approve the new Project Assessment or pay for hours incurred for the design phase.

NIBI will provide documentation of all Project Assessment hours through normal job accounting reporting, and NIBI will retain all proprietary rights to software modifications made at the request of the customer, including the right to copy and distribute the software.

Your signature below authorizes NIBI to proceed with this project.

\_\_\_\_\_  
Customer Signature  
Deerfield Farmers Tel. Co.

Date

Ray Adams / mm 3-8-00  
NIBI Signature

Date

## **BILLING INSERT SAMPLE USING STATEMENT MESSAGES**

### **TRUTH-IN-BILLING REGULATIONS**

New FCC regulations have taken effect which require telephone companies to reformat their customer bills in order to provide:

- Clear identification of the name of the Service Provider associated with each charge.
- A brief, clear, plain language description of the services included on the customer's bill.
- Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
- Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement).
- A differentiation between deniable and non-deniable charges.

#### **HOW WE ARE COMPLYING:**

- We continue to try to provide a bill that is as clear and understandable as possible. We are completing computer and systems work necessary to make the changes to reflect the FCC Truth-In-Billing regulations.
- We have not yet changed your bill to list the name and contact number of dial-around or alternative operator service providers. In such instances, if these charges appear on our bill, we will respond to your inquiries at the following toll- free number.

**T. Holeman**

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**From:** T. Holeman <tholeman@cass.net>  
**To:** <vickis@nibinc.com>  
**Sent:** Thursday, March 09, 2000 10:26 AM  
**Subject:** Truth in Billing

Hi Vicki,

I have a few questions on the letter that was faxed to us on 3/8 re: TIB rules.

1. Requirement #4: Am I understanding that as far as NIBI is concerned, the only thing that you won't be in compliance with as of April 1 is the 020-A module? All other items that need to be done can be updated by our company on our own because there are already options available?

The only item we would have to file a waiver with the FCC for is the Service Provider Change scheduled for June 1?

This will cost between [REDACTED] & [REDACTED]?

2. On Requirement #1: Does this mean we should set up a vendor code for Deerfield Farmers Telephone Company that will print on the local portion of the bill to show customers that we are the local provider of these charges? Also on the Project Assessment this would cost between [REDACTED] and [REDACTED]? This amount represents the cost to get other vendor names on the local bill? This is very confusing to me.

3. On Requirement #2: I went through our icc codes and made sure that all descriptions make sense, and are not misleading

We itemize these each month for all customers. I believe we are in compliance with this one.

4. On Requirement #3: Display toll free numbers, Where do we get these? Do we use the ones that our csr's use to call Carriers?

Currently we have our own local phone number listed for billing inquiries on the toll pages, Is this where you guys are suggesting we

put the toll free number? Is this something that we put in through our set up of our main billing screen? I'm guess I'm not sure how

that phone number got on there.

The other way would be for us to remember to type a message page each month with toll free numbers for carriers? It sounds like from now

on we will always have a message page. I am confused about the requirement.

5. Requirement #5: I have read the definition of deniable and non-deniable charges several times. But I have not found anything to tell

me what I can disconnect a bill for and what I can't. For example 900 calls, we can't disconnect if they are in dispute. What are the certain

charges that wouldn't result in termination? Class features, inside wire, leasing phones? Help!

So, for this requirement, I can put an "" next to the icc codes (after someone explains them to me) or set up a vendor code and have these codes print underneath this heading each month, as well as putting a statment of the message page? Is this right?



Miscellaneous Questions:

What does "No coding changes" mean?

Does "clear description of services can be handled through setup" mean that we can make those changes internally to the billing system?

We are confused on what NIBI is in compliance with. The letter doesn't seem to be that black & white. Our attorney called yesterday and they don't get it either.

It's hard to put questions in writing, or for that matter even to verbally ask them. I hope these make sense. Can you please respond as soon as possible?

Thanks!

Teresa

Valley Telephone Cooperative, Inc.  
Copper Valley Telephone, Inc.



# **Martin & Associates, Inc**

*Engineering. Consulting. Computer Solutions.*

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|---------------|--------------|
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| Billing       | 800-651-3762 |
| CABS          | 800-651-3759 |
| Hardware      | 800-651-3758 |
| OCPs          | 800-651-3763 |
| Service Order | 800-651-3764 |

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To: Valley Tel (AZ) / Copper Valley (Business Fax)  
Company:  
Fax number: +1 (520) 826-3682

From: Martin and Associates IS Support  
Fax number: +1 (605) 995-1500

Date & Time: 10/14/99 3:26:25 PM  
Pages: 3  
Re: Software announcement 99014

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## **Important Notice**

This facsimile is intended only for the use of the person to which it is addressed, and may contain information that is privileged and confidential. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination or distribution of this communication is strictly prohibited. If you have received this facsimile in error, please notify us immediately by telephone at 605-996-9646. Thank You.

10/22/99 Called to find out firm release tape date  
Contacted M&A - spoke w/ Jennifer in billing: She stated Dave Dierks is the contact re: this issue. He was on the phone & Jennifer said she would leave him a msg to call us.

Dave called back - should receive tape after 1st of Nov.  
He will make a note & make us top priority since we have a mid-month cycle.

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Copy to: Donna, Cori, Tricia, Judy, Rich, Heather, Wendy

# MARTIN & ASSOCIATES, INC.

Truth In Billing

Software Announcement 99-014

October 14, 1999

The Truth in Billing ruling as issued by the FCC has been recorded in the Federal Register on October 12 with effective dates of November 12, 1999, and April 1, 2000. There are two separate dates with specific requirements for each date. At this time there are also a number of groups reacting to the latest ruling, hoping to still delay the implementation of the first part of the ruling. This document will update you as to what we at Martin & Associates are doing and what you could be doing in preparation to comply with the ruling. This information, along with your workload assessment, should enable you to decide how your Telephone Company will need to respond to the requests you are receiving.

## November 12, 1999 Requirements

- ✓ 1. **The name of the service provider associated with each charge must be clearly identified on the bill.** The telephone companies are considered to be the service provider of local services. The long distance carriers would be the service providers for the toll calls; they can have their company identified on the bill. If you bill for other services on your bill, such as Internet or CATV, these charges can be identified under a separate provider using totaling codes to separate local service and other charges into each of these categories.
- ✓ 2. **Where charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider.** Our software currently does this by separating the charges on separate pages on the bill. For situations where multiple carriers are grouped together on customer bills, the capability exists to separate the carriers by half line, whole line, or have no page division between carriers. With each of these options, the charges are still separated by service provider.
- TH & KL 3. **Charges contained on telephone bills must be accompanied by a brief, clear, non-misleading, plain language description of the service or services rendered. The description must be sufficiently clear in presentation and specific enough in content so that customers can accurately assess that the services for which they are billed correspond to those that they have requested and received, and the cost for those services conform to their understanding of the price charged.** There are no software changes required to accomplish this part of the ruling. Your company will need to review descriptions of your USOC and OCC charges as well as the presentation of these charges. The capability of displaying an itemized listing of monthly charges is currently available by printing your local service detail or setting up totaling codes.
4. **Telephone bills must contain clear and conspicuous disclosure of any information that the customer may need to make inquiries about, or contest charges, on the bill. Common carriers must prominently display on each bill a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill. A carrier may list a toll-free number for a billing agent, clearinghouse, or other third party, provided that such party possesses sufficient information to answer questions concerning the customer's and is fully authorized to resolve consumer complaints on the carrier's behalf. Each carrier must make its business address available upon request to consumers through its toll-free number.** Modifications to software have been made to accommodate this. The release of this software is scheduled so the November 12, 1999 deadline is met. The software will need to be populated with

Continued on next page...

Please refer any questions to the appropriate IS Support Group.

the toll-free numbers for the carriers for which you are billing. It is your decision if you consider yourself a qualified agent to handle customer's complaints and wish to be the point of contact for the carriers. Our software currently allows the entry of one number per carrier. For those carriers that have both business and residential contact numbers, you need to select which number you wish to input. Including the ability to add another contact number is planned in a future release.

### **April 1, 2000 Requirements**

The "Highlighting of new services provider" rule and "Deniable-non-deniable" rule will be reviewed and programmed for after January 1, 2000.

### **Frequently Asked Questions**

**1. Is there any cost for these enhancements?**

The answer is No, the changes will be part of the yearly enhancement charges— These are required to meet industry guidelines so everyone will be required to comply and will be receiving them. If your **state** has specific rulings, that require programming changes to accommodate, we would determine at that time if there would be costs associated.

**2. Will our software be ready to handle the ruling?**

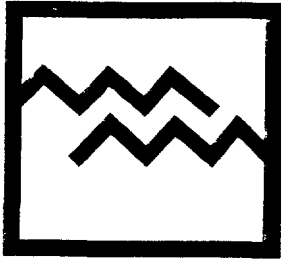
As explained previously, we are ready with the software. There will be work required on your part to modify Tables, add toll-free numbers, and review USOC descriptions. You will need to plan time to be ready.

**3. Does getting ready for this interfere with our Y2K efforts?**

The majority of our Y2K efforts are completed, there are some company specific programs that have surfaced that we are working with the specific companies to resolve, none of which are mission critical to daily operations for Y2K.

**4. Is there a 'prepared' response for the questionnaires we are receiving from various organizations attempting to hold off the ruling?**

No - Each company is different, and you need to look at your schedule for the next 30-45 days to determine if you will be able to get ready for this. As stated previously, you will need to decide if you are comfortable with the descriptions you have for your USOCs, pull together the toll-free numbers for the carriers for which you bill, etc. This announcement was prepared so you would be able to make the decisions regarding your readiness to comply.



Valley Telephone Cooperative, Inc.  
Copper Valley Telephone, Inc.  
Valley Telecommunications Co.

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## THE VALLEY COMPANIES

### Memorandum

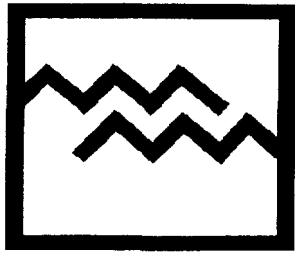
**To:** Judy Bruns  
**From:** Kristi L. Lee *Kristi*  
**Date:** October 27, 1999  
**Re:** Truth-In-Billing

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After discussion with Terri and Donna, we feel it is necessary to file an extension for meeting the November 12<sup>th</sup> deadline. This need arises from our dependency on Martin & Associates to provide us with a release tape and also the re-formation of our local service layout. Per conversation with Dave Dierks, the release tape will be available "around the first of November". Taking into consideration the first week of November is their User Group meeting, we do not feel comfortable we will receive the tape in time to ensure compliance. We will be closing for CVT on the 9<sup>th</sup> due to the holiday on the 11<sup>th</sup>, which makes the timeline even narrower.

I have left a voice mail with Margaret Nyland notifying her of our wish to file an extension for both Valley and Copper. I told her we would like an extension date of January 15<sup>th</sup>, 2000. She is in a meeting, therefore I do not know if I will have a chance to speak with her today. I advised her I would be out of the office until Wednesday of next week and if she had any questions to please contact you.

If you have any questions, Donna or Terri can assist you.



**VTC**

**VALLEY TELEPHONE COOPERATIVE, INC.**

## MEMORANDUM

DATE: 11/13/99

TO: Kristie Lee

FROM: Judy Bruns

SUBJECT: Truth In Billing



Kristie,

I can't remember if I copied this document to you so I am sending it to you now. Just a couple of questions about the issues raised in this document. (1) Do we include an e-mail address for our customers that want to e-mail instead of call? (2) Have we sent a sample of our bill format to Kraskin's office for Margaret to review and ensure our compliance with this ruling? I copied this document to Rich for an FYI and for his compliance files. What did you find out from Margaret on the Wireless carrier requirements for this ruling? Can I have an update please? I told him that you were handling it. If you have any questions, you guys can get together and discuss. Thanks for the excellent way that you keep on top of things.

Thanks,

Judy

*cc: Kristi, Terre Hester, Heather + Wendy*

# MARTIN & ASSOCIATES, INC.

## Truth In Billing Update

*Rev'd*  
*11/15/99*

Software Announcement 99-014A

November 12, 1999

There are a couple items relating to the Truth In Billing requirements for November 12 that we would like to update you on.

1. **The name of the service provider associated with each charge must be clearly identified on the bill.** We can recognize primary CIC providers including identified AOS CIC codes and place them on the bill with their charges. Through recent investigation and industry interpretation of the TIB requirements, it appears as though Sub CIC codes should also be identified and separated on the bill. Our current software does not identify and separate the Sub CIC's under a Sub CIC section. Our software will consolidate the Sub CIC calls under the primary CIC for those calls. There is confusion within the industry due to the uncertainty of who is the Inquiry contact, the Sub CIC or the Primary CIC. This confusion is resulting in considerable controversy concerning these requirements. We will be reviewing this for future enhancements. **If your company considers this to be a major concern you should make sure a wavier is being filed by you or a representative organization which would grant you reprieve for this specific part of the TIB.**
2. During our recent User Meeting we discussed the software modifications made to incorporate carrier contact toll free numbers on your bill forms. After you have added your carrier contact numbers in your TABLES-CARNAM table, they will display as follows:

### ABC TELEPHONE CURRENT CHARGES

|   |       |
|---|-------|
| MONTHLY TELE SERV FROM SEP 01 TO SEP 30     | 7.20  |
| FCC PRESCRIBED CHARGE                       | 3.50  |
| COMMUNICATIONS IMPAIRED FUND                | .15   |
| E-911 SERVICE CHARGE - DOUGLAS COUNTY       | .75   |
| Total Recurring                             | 11.60 |
| Taxes FED 0.33 STA 0.44 LOC 0.21            | 0.98  |
| <hr/>                                       |       |
| TOTAL LOCAL CHARGES                         | 12.58 |
| AT&T COMMUNICATIONS CHARGES 1-800-CALL-ATT  | 15.40 |
| SPRINT LONG DISTANCE CHARGES 1-800-123-1234 | 1.42  |

TOTAL CURRENT CHARGES

29.40

In addition, we recommend the first time bills are printed containing these contact numbers a message is added to the customer's bills explaining that these number should be used for billing inquiries for the associated carrier. This should aid in reducing confusion for customer who may believe that they have been billed for calls to this 800 number. This message may be added via the PRTBIL messaging tables options.

If you need assistance in attaching this message to your customer's bills contact Billing IS Support for assistance.

*Please refer any questions to the appropriate IS Support group.*



cc. RASTI, Julie Heater, Heather + Wendy



Document Number: M&A 00-003

Date: January 3, 2000

To: All LEC Clients

RE: Truth In Billing Update

*the*  
**ONE SOURCE**

## Client Memo

The following information was taken from a memo from Julie Rones, USTA Senior Legal Counsel, USTA, dated 12/28/99.

On Dec 27, 1999 the FCC released an order in response to a Joint Petition filed by NECA, NTCA, and OPASTCO. The petition sought a limited waiver on behalf of small and rural carriers who use billing vendors and could not comply with the November 12 deadline to include on the customer's bills 1) Provider identification, 2) Separation by provider, and 3) Billing Inquiry contact information for third party charges with respect to dial around or AOS provider calls.

In approving the order, the Commission gave carriers until April 1, 2000 to be in compliance and extended waivers to all carriers who are similarly situated, regardless of whether they filed for waiver relief or not. In the meantime, **Carriers that are not in compliance must include billing inserts stating that the name and contact number of dial around or AOS providers may not be listed on the bill in circumstances as required by Commission rules, and that the carrier on whose bill the charges appear will respond to customer inquiries directed to its own toll free consumer inquiry number.**

As stated in Software Announcement 99-014A dated November 12, 1999, we can recognize primary CIC providers including identified AOS CIC codes and place them on the bill with their charges. However, current software does not identify and separate the Sub CICs under a Sub CIC section. Our software will consolidate the Sub CIC calls under the primary CIC for those calls.

To comply with this waiver, we recommended you create a separate message page on your customer bills. The text of the message has been left to the discretion of your company. If you need reference information on creating a bill message, please refer to the Bill Presentation section of the May 1999 User Meeting CD.

If you need additional assistance with the bill message, please contact IS Billing Support at 1-800-651-3762.

**Kristi L. Lee**

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**From:** Kristi L. Lee [kristi.lee@vtc.net]  
**Sent:** Monday, February 14, 2000 10:38 AM  
**To:** Dave Dierks (E-mail)  
**Subject:** Truth-In-Billing

Dave,

I have a few questions regarding TIB implementation.

- 1) What is the anticipated date for the delivery of the software upgrade necessary for **full** TIB compliance?
- 2) What amount of testing will have been completed prior to delivery of the software?
- 3) What amount of on-site testing do you anticipate will be required?
- 4) M&A Software Announcement 99-014A dealt with the issue of Primary CIC versus Sub CIC and who would be the inquiry contact for calls placed via Sub CIC. It stated "We will be reviewing this for future enhancements." Will this be enhancement be included in the TIB upgrade release?

Thank you in advance for your prompt response.

Sincerely,  
Kristi

**Kristi L. Lee**

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**From:** Dave Dierks [DaveDierks@Martin-Associates.com]  
**Sent:** Monday, February 14, 2000 10:46 AM  
**To:** 'Kristi L. Lee'  
**Subject:** RE: Truth-In-Billing



ATT00001.txt; charset  
= window...

Dave,

I have a few questions regarding TIB implementation.

1) What is the anticipated date for the delivery of the software upgrade necessary for full TIB compliance? We don't have a scheduled date of release at this time

2) What amount of testing will have been completed prior to delivery of the software? We intend to test this in house and at a beta site(s) prior to a mass release. Since we have clients billing at various times during the month, we should be able to find locations to beta test. Part of this will also be determined by the AOS providers supplying the module information. They are planning to have that available March 15, from what I've understood.

3) What amount of on-site testing do you anticipate will be required? There shouldn't be much testing, however, there will be some table set up required. I would suggest that you plan to give yourself an extra day when you bill the first time.

4) M&A Software Announcement 99-014A dealt with the issue of Primary CIC versus Sub CIC and who would be the inquiry contact for calls placed via Sub

CIC. It stated "We will be reviewing this for future enhancements." Will this be enhancement be included in the TIB upgrade release? We have received the information from the AOS providers. The Sub CIC's will be loaded into the software from an excel spreadsheet, or some form of database. Each AOS provider has 4-5000 sub CIC's, so this is GREAT progress. The Sub CIC will not have a phone number to be contacted for inquiries, the primary CIC will be responsible for supplying us with the phone number. The Sub CIC will show as the carrier, which it is supposed to and the Primary carrier will be the contact. I hope this makes sense, if you have any questions, please reply or call me.

Thanks

**INDEPENDENT  
NECA  
SERVICES, INC.**

80 South Jefferson Road  
Whippany, NJ 07981

**RAYMOND L. WOLITZ**

Executive Director

Voice: 973-884-8130

Fax: 973-884-8151

E-mail: rwolitz@neca.org

**Date: February 15, 2000****To: Exchange Carrier Participants in the INS Billing and Collection Program****Re: Implementation of Truth in Billing Requirements**

As previously described in my correspondence of January 3, 2000, the FCC has granted a limited waiver until April 1, 2000 to implement the requirements of the Truth in Billing Order. By that date, all customer bills must contain the following information:

1. Clear identification of the name of the Service Provider associated with each charge on the customer's bill.
2. A brief, clear, plain language description of the services included on the customer's bill.
3. Prominent display on the bill of a toll-free number (or numbers) by which customers may inquire or dispute any charge on the bill.
4. Clear and conspicuous notification of any change in Service Providers (Service Providers that did not bill for services on the previous billing statement including, where appropriate, any new presubscribed or continuing relationship with the customer.
5. A differentiation between deniable and non-deniable charges

Relative to Item 1, in cases where charges from Service Providers are sent by a clearinghouse or other "aggregator", each individual Service Provider must be identified. In such cases, individual Service Providers are identified by their Sub-CIC code.

The Ordering & Billing Forum (OBF) has recommended the use of a 002-B module as the industry standard for sending Sub-CIC codes. This recommendation was based on the limited space available on a standard 175 fixed character EMI record.

Consequently, in a letter sent to all Service Providers who participate in INS billing and collection programs, INS has recommended that beginning March 15, 2000, Service Providers send all required Sub-CIC information in 002-B modules.

Relative to Item 4, on February 7<sup>th</sup> OBF adopted the 020-A module as the industry standard for the identification of new Service Providers. As with the 002-B module, INS has advised Service Providers to also start utilizing this module beginning March 15<sup>th</sup>.

In addition, where in the past INS has had its Service Bureau, UDP, truncate EMI records containing modules for certain Exchange Carriers who were not able to process such modules,

INS has now advised UDP that, beginning March 15<sup>th</sup>, UDP send the entire EMI record, including any modules, to the Exchange Carrier.

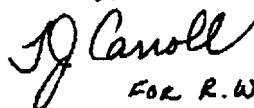
For Exchange Carriers who do billing for third parties, this means that by March 15, 2000 their billing systems should have the capability to accept and process 002-B modules and 020-A modules.

You will also recall that in October, 1999, INS requested that you provide Time and Cost (T&C) estimates for changes to your billing system, or your Service Bureau's system if appropriate, to comply with Truth in Billing requirements. We have analyzed the results of that survey and are planning to begin discussions with Service Providers on reimbursements to cover these costs. If you have not completed a Time and Cost estimate you can do so on the INS website at [www.ins.org](http://www.ins.org).

In summary, INS has recommended that, beginning March 15, 2000 all Service Providers begin sending 002-B modules and 020-A modules and that UDP cease to truncate modules sent with EMI records. If you feel that your company will not have the capability to accept and process these modules by March 15, please contact either Kathy Roman at 1-800-524-1020, extension 8474 ([kroman@neca.org](mailto:kroman@neca.org)) or Jean Snopkowski at 1-800- 524-1020, extension 8146 ([jsnopko@neca.org](mailto:jsnopko@neca.org)).

Should you have any questions concerning this correspondence, or any other issues concerning Truth in Billing, please contact Tom Carroll, Director - Operations Management, on 1-800-524-1020, extension 8558, or by E-mail at [tcarrol@neca.org](mailto:tcarrol@neca.org).

Sincerely,

  
FOR R. WALITZ

cc: T. Carroll  
K. Roman  
J. Snopkowski

*2/16/00 E-mailed Dave re:*

**Kristi L. Lee**

---

**From:** Kristi L. Lee [kristi.lee@vtc.net]  
**Sent:** Wednesday, February 16, 2000 4:14 PM  
**To:** Dave Dierks (E-mail)  
**Subject:** TIB

Dave,

I received notification from INS that beginning March 15th UDP will no longer truncate modules sent with EMI records. Will our current software be capable of accepting and processing these records?

Please advise so, if necessary, I can make the appropriate contact with INS.

Thanks,  
Kristi

[Yes it will:

-----Original Message-----

From: Kristi L. Lee [mailto:kristi.lee@vtc.net]

Sent: Wednesday, February 16, 2000 5:14 PM

To: Dave Dierks (E-mail)

Subject: TIB

Dave,

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capable of accepting and processing these records?

Please advise so, if necessary, I can make the appropriate contact with INS.

Thanks,  
Kristi



*the*  
**ONE SOURCE**

*Kristi, Julie, Kara*

*Wanna meet?*

Document Number: M&A 00-023

Date: February 17, 2000

To: All Clients

RE: Truth In Billing Update

## Software Announcement

The Truth in Billing ruling issued by the FCC was recorded in the Federal Register with effective dates of November 12, 1999, and April 1, 2000. This document is meant to reiterate what you should have completed for the November 12, 1999 deadline and will update you as to what we at Martin & Associates are doing to help you meet the April 1, 2000 deadline.

### November 12, 1999 Requirements

1. The name of the service provider associated with each charge must be clearly identified on the bill.

#### **Action Required:**

**Your company must set up the customer bills to separate services by provider.**

Telephone companies are considered to be the service provider of local services. The long distance carriers would be the service providers for the toll calls; they can have their company identified on the bill. If you bill for other services on your bill, such as Internet or CATV, these charges can be identified under a separate provider using totaling codes to separate local service and other charges into each of these categories.

#### **How To:**

If your company has not yet made accommodations on your bills for this portion of the ruling because you are unsure of how to proceed, please refer to the following steps for assistance.

**If your company currently uses Totaling Codes (In-Line Format) to display charges on your bills, IS Support recommends reviewing steps 1-5 below to make sure everything is set up correctly.**

1. Check that your totaling groups are entered in the TABLES-TOTALCODE table. You will need an entry for each type of service, Telephone, Internet, CATV, etc.
2. Review all USOCs via TABLES-USOC to be sure they have been assigned an applicable totaling code.
3. Review all OCCs via TABLES-OTHCHG to be sure they have been assigned an applicable totaling code.
4. Check the PRTBIL-TABLES-ADDITIONAL table to be sure a default totaling code has been entered. The default totaling code is used if a new USOC or OCC is set up without a totaling code assignment.
5. Be sure that PRTBIL-TABLES-NEWOPTIONS question #33 is set to 'Y'.

*Please refer any questions to the appropriate IS Support Group.*



If your company **does not currently use Totaling Codes (In-Line Format)** to display charges on your bills **and you wish to begin** using them, contact IS Support for assistance.

If your company **does not currently use Totaling Codes (In-Line Format)** to display charges on your bills **and you DON'T want to**, be sure you are printing your local service detail each month to comply with this ruling. To print local service detail make sure that PRTBIL-TABLES-NEOPTIONS question #12 is set to 'Y'. With that, you may omit the printing of equipment using question #18. Be sure you have selected a page in which to print local service through question #11.

2. **Where charges for two or more carriers appear on the same telephone bill, the charges must be separated by service provider.**

**Action Required:**

**No action is required by your company.**

The M&A software currently does this by separating the charges on separate pages of the bill. For situations where multiple carriers are grouped together on customer bills, the capability exists to separate the carriers by half line, whole line, or have no page division between carriers. With each of these options, the charges are still separated by service provider.

Sub-CIC requirements (as covered by the waiver granted December 27, 1999) will be met with the April 1, 2000 deadline as explained in the 'April 1, 2000 Requirements' section of this document.

3. **Charges contained on telephone bills must be accompanied by a brief, clear, non-misleading, plain language description of the service or services rendered. The description must be sufficiently clear in presentation and specific enough in content so that customers can accurately assess that the services for which they are billed correspond to those that they have requested and received, and the cost for those services conform to their understanding of the price charged.**

**Action Required:**

**Your company will need to review descriptions of your USOC and OCC charges as well as the presentation of these charges.**

No software changes are required to accomplish this part of the ruling. The capability of displaying an itemized listing of monthly charges is currently available by printing your local service detail or setting up totaling codes. Refer to the 'How To' section of Requirement #1 listed under the 'November 12, 1999 Requirements' section of this document.

**How To:**

If your company has not yet made accommodations on your bills for this portion of the ruling because you are unsure of how to proceed, please refer to the following steps for assistance.

1. Print out all USOC and OCC table entries via TABLES-REPORTS-USOC and TABLES-REPORTS-OTHCHG.
  2. Review the descriptions of all USOCs and OCCs.
  3. If a USOC or OCC needs further clarification in its description, make the change in TABLES-USOC or TABLES-OTHCHG.
  4. Print out all total page design entries via PRTBIL-TABLES-TOTAL.
  5. Review the descriptions of all Total Page Design entries.
  6. If a Total Page Design entry needs further clarification in its description, make the change in PRTBIL-TABLES-TOTAL.
- 
4. **Telephone bills must contain clear and conspicuous disclosure of any information that the customer may need to make inquiries about, or contest charges, on the bill. Common carriers must prominently display on each bill a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill. A carrier may list a toll-free number for a billing agent, clearinghouse, or other third party, provided that such party possesses sufficient information to answer questions concerning the customer's and is fully authorized to resolve consumer complaints on the carrier's behalf. Each carrier must make its business address available upon request to consumers through its toll-free number.**

**Action Required:**

**Your company must make certain that all carrier contact numbers are entered into the TABLES-CARNAM table to accommodate this portion of the ruling.**

Our software currently allows the entry of one number per carrier. For those carriers that have both business and residential contact numbers, you need to select which number you wish to input. Including the ability to add another contact number is planned in a future release.

**How To:**

If your company has not yet made accommodations on your bills for this portion of the ruling because you are unsure of how to proceed, please refer to the following information for assistance.

Enter the toll free contact number for each carrier in the *PIC Carrier Contact Number* field in the TABLES-CARNAM table.

## **April 1, 2000 Requirements**

- 1. ...bills must provide a clear and conspicuous notification of any change in service provider, including notification to the customer that a new provider has begun providing service.**

AOS providers will have the capability to send Sub-CIC information in two modules on the call record. The modules are 002B and 020A. Module 002B stores the Sub-CIC. Module 020A stores a value (1, 2, or 3) that tells us if the service provider is:

- 1 - A New pre-subscribed provider
- 2 - New non-pre-subscribed provider
- 3 - New unspecified provider

Programming is currently being done to read these new modules. If the modules are populated, the system will print a message on the customers' bills explaining that there is a new service provider.

In addition, we are working with the AOS providers to get a file for use in loading all of the initial Sub-CIC information including the main carrier CIC, Sub-CIC description, and contact phone numbers. We plan to load this information on your system in a file. Programming will be done to accommodate this initial file load.

### **Action Required:**

At this time, **someone from your company** must request that your AOS provider begin sending modules 020A and 002B. Contact your AOS provider and make this request as soon as possible. If your AOS provider is sending you the modules before the software is released to accommodate them, it will not cause a problem with your toll processing. You will at least have the modules as soon as the software is released to your company.

**If you are your own carrier**, you will need to contact the company that provides your toll records to determine if they will be able to include the modules 020A and 002B. If they do **not** implement these modules, **your company** will have to determine new subscribers via the Report Writer program each month - selecting those customers who have PICd your carrier during the billing period. You would then use a source file to attach a message to those customers' bills.

- 2. Where a bill contains charges for basic local service, in addition to other charges, the bill must distinguish between charges for which non-payment will result in disconnection of basic local service and charges for which non-payment will not result in such disconnection.**

Each Telephone Company and each State has different requirements for disconnection of service. To allow adequate flexibility, IS Support advises that you use the messaging capabilities within the billing system to meet this requirement.

It is up to the discretion of your company to make the decision concerning how the notification should be worded, based on your Telephone company's policies and the regulations of the state in which you provide service. You may wish to refer to the text of you print on your final or reminder notices for an idea on how this message should be stated.

### **How To:**

If your company has not yet made accommodations on your bills for this portion of the ruling because you are unsure of how to proceed, please refer to the following steps for assistance.

To put a message on your customer bills:

1. Set up the message in PRTBIL-TABLES-MESSTEXT.
2. Apply the message to subscribers through the messaging table that best suits the customers you are targeting. Your most-likely options are ALLMESS, USOCMESS, or SRCMESS.
3. For more information on messaging, please refer to the May 99 User Meeting CD.

Following are paragraphs 44 through 47 taken directly from FCC document 99-72 concerning Truth In Billing requirements. This is to help you clarify the meaning of "Deniable" and "Non-Deniable" charges.

### **"Deniable" and "Non-Deniable" Charges**

44. We further conclude that, where additional carrier charges are billed along with local wireline service, reasonable practice necessitates that carriers clarify when non-payment for service would not result in the termination of the consumer's basic local service. More specifically, we adopt the guideline we proposed in the *Notice* that telephone bills differentiate between what are commonly referred to as "deniable" and "non-deniable" charges. A "deniable" charge is a charge that, if not paid, may result in the termination – "denial" – of the customer's local exchange service. Conversely, a "non-deniable" charge is a charge that will not result in the termination of the customer's basic service for non-payment, even though the particular service for which the charge has been levied, *e.g.*, paging service, could be terminated. We agree with the comments of state regulatory agencies and consumer advocacy groups that distinguishing between such charges on consumers' bills protects consumers from paying contestable, unauthorized charges out of fear of losing basic telephone service for non-payment. Based on this consumer protection rationale, many states, including New York, Pennsylvania, Ohio, California, Oregon, and Arizona have enacted similar requirements. The FTC comments that providing this information on bills will reduce slamming and cramming by enabling consumers to question charges without fear of losing service. We agree that consumers should not be intimidated into paying contestable charges because of fear that they will lose telephone service. We likewise believe that consumers must be fully empowered and apprised of their right to refuse to pay for unauthorized charges. Accordingly, we conclude that carriers must clearly identify on bills those charges for which non-payment will not result in disconnection of basic, local service.

45. We agree with those commenters who state that the terms "deniable" and "non-deniable" are inherently confusing, if not counter-intuitive, and therefore fail to achieve the basic goal of signaling to consumers their rights with respect to such charges. Rather than mandate any particular means for accomplishing this goal, however, we merely require that carriers clearly and conspicuously identify those charges for which nonpayment will not result in termination of local service. We note with approval the suggestions of some commenters that this may be best accomplished by noting charges with an asterisk or other symbol directing the consumer to an explanatory footnote. This footnote could provide information similar to that mandated by the pay-per-call provisions of the Act. Carriers may also elect to devise other methods of informing consumers on the bill that they may contest charges prior to payments.

46. We emphasize, however, that this guideline only applies where carriers include in a single bill both "deniable" and "non-deniable" charges. Accordingly, a carrier that bills directly for service that includes no charges for basic, local wireline service would not have a disclosure obligation. In this direct billing circumstance, we are persuaded that consumers understand that, for example, their wireless or interexchange service may be disconnected should they fail to pay the bill for the specific service involved, but that their basic local service, billed on a separate invoice, will not be disconnected. Accordingly, requiring carriers to disclose such information on direct bills that contain no basic local service charges would place a burden on carriers without any corresponding consumer benefit. We further note that, whether a charge is or is not "deniable" varies according to state law. Our requirement is not meant to preempt states that have yet to adopt such a distinction.

47. We are unpersuaded by some commenters that customers should be informed of these rights through a "dunning message" issued prior to termination of service for non-payment, rather than through the telephone bill. Such an approach does not protect those consumers who pay charges that they did not authorize out of the mistaken fear that their service will be disconnected if they fail to pay. The complaints we receive demonstrate that many consumers pay disputable charges immediately, even if they believe the charge is unauthorized, out of fear of losing local service. These consumers would not receive any dunning notice and, thus, would remain unaware of their rights with regard to these charges.

As more information is available concerning our progress with the Truth in Billing requirements, we will notify you.

If you have any questions on setting up the tables as referenced in this document, please contact IS Billing Support at 1-800-651-3762.

☒ **Contact M&A re: TIB implementation**

Due Date: 3/1/00

Category: Unfiled

Note: Asked Dave if AT&T would also be submitting the 020 A record. He said yes. Any carriers that utilized Illuminet, INS & AT&T would be using 020 A (notification of new pre-sub, etc). Also asked how programming was going on Sub-Cic. He was not sure when it would be completed. His interpretation of the ruling was if our bills were in the customers hands by the 1st, we did not have to comply for that cycle. We close our billing approx. 2-3 days before the cycle date, but I'm not sure the bills would get to the sub by the 1st. Also there is still the issue with the Copper cycle and if they would be able to comply by then. He felt sure they would, but I do not feel his same confidence. Left msg for Margaret Nyland to plz call me re: ths issue.

3/6/00

Left message for Wane, 1:45

Wane left msg for me 2:47

Tried to call back - recept. paged  
& no response

3/7/00

Called for Wane - out of the office today, & tomorrow. Asked to speak w/ someone re: TIB program upgrade.

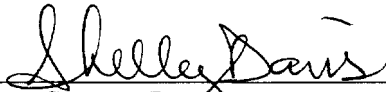
Spoke w/ Haver in billing support. Explained our reg. attorney's interpretation of the ruling. He went looking for someone with an answer.

He called back & their interpretation is the system has to be in place by April 1st. They will have the system available for use by Apr. 1.

When I asked the expected download date so I could file for an appropriate extension, he stated "there are no exact dates".

### CERTIFICATE OF SERVICE

I, Shelley Davis, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC, 20037, hereby certify that a copy of the foregoing "Supplement to March 21, 2000 Petition for Temporary, Limited Waiver" was served on this 27<sup>th</sup> day of March, 2000, by hand delivery to the following parties:

  
Shelley Davis

Lawrence Strickling, Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, SW, Room 5-C450  
Washington, DC 20554

Carol Matthey, Deputy Chief  
Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room 5B125  
Washington, DC 20554

Glenn T. Reynolds, Division Chief  
Market Disputes Resolution Division  
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